

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:
	:
Plaintiff,	:
	:
v.	:
	:
STEVEN DONZIGER, et al.,	:
	:
Defendants.	:
----- X	

Case No. 11 Civ. 0691 (LAK)

**DECLARATION OF JASON B. STAVERS IN SUPPORT OF CHEVRON  
CORPORATION'S OPPOSITION TO DEFENDANTS' EMERGENCY MOTION  
FOR STAY PENDING APPEAL OR, IN THE ALTERNATIVE,  
FOR A TEMPORARY ADMINISTRATIVE STAY**

I, JASON B. STAVERS, hereby declare under penalty of perjury pursuant to 28 U.S.C.  
§ 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of Colorado and the State of California and admitted to practice before this Court pro hac vice. I am an attorney at the law firm of Gibson, Dunn & Crutcher LLP and counsel of record for Chevron Corporation ("Chevron") in the above-captioned matter. I am personally familiar with the facts set forth herein, unless the context indicates otherwise.

2. Attached hereto as Exhibit A is a true and correct copy of an article titled "Chevron's Flawed RICO Decision in Ecuador Case Violates First Amendment and Will Backfire in International Courts, Defendants Say," dated March 4, 2014, as it appeared on the website ChevronToxico.com on March 4, 2014.

3. Attached hereto as Exhibit B is a true and correct copy of a transcript of a March 19, 2014 press conference given by Steven Donziger and other members of the LAP team, and an English translation thereof.

4. Attached hereto as Exhibit C is a true and correct copy of an article titled “People Affected by Chevron Request Stay in US of Ruling in Favor of Oil Company,” dated March 19, 2014, as it appeared on the website [eltelegrafo.com.ec](http://eltelegrafo.com.ec) on March 20, 2014, and an English translation thereof.

5. Attached hereto as Exhibit D is a true and correct copy of an article titled “NY judge rules for Chevron in Ecuador case,” dated March 4, 2014, as it appeared on the website [WSJ.com](http://WSJ.com) on March 27, 2014.

6. Attached hereto as Exhibit E is a true and correct copy of an article titled “Chevron’s Mockery of Justice: How the Oil Giant’s RICO Decision Suffers from Five Fatal Flaws,” dated March 25, 2014, as it appeared on the website [ChevronToxico.com](http://ChevronToxico.com) on March 26, 2014.

7. Attached hereto as Exhibit F is a true and correct copy of an article titled “Don’t Buy Chevron’s Big Lie!,” dated March 25, 2014, as it appeared on the website [amazonwatch.org](http://amazonwatch.org) on March 25, 2014.

8. Attached hereto as Exhibit G is a true and correct copy of the ruling in *Chevron Corp. v. Deleon*, Claim No. 2012-C232 (Sup. Ct. Gib. Mar. 14, 2014).

9. Attached hereto as Exhibit H is a true and correct copy of an article titled “Ecuadorians request stay of the U.S. judgment in favor of Chevron,” dated March 19, 2014, as it appeared on the website [google.com/hostednews/afp](http://google.com/hostednews/afp) on March 19, 2014, and an English translation thereof.

10. Attached hereto as Exhibit I is a true and correct copy of a letter from Clinton R. Losego of the Gunster Law Firm to Stephen N. Zack of Boise, Schiller & Flexner LLP, dated May 17, 2013.

11. Attached hereto as Exhibit J is a true and correct copy of excerpts from a transcript of the June 25, 2013 deposition of Steven Donziger in *Chevron Corp. v. Donziger*, No. 11 Civ. 0691 (S.D.N.Y.).

12. Attached hereto as Exhibit K is a true and correct copy of excerpts from a transcript of the June 28, 2013 deposition of Steven Donziger in *Chevron Corp. v. Donziger*, No. 11 Civ. 0691 (S.D.N.Y.).

13. Attached hereto as Exhibit L is a true and correct copy of an article titled "Let's Focus on the Real Issues," dated March 17, 2014, as it appeared on the website lettersblogatory.com on March 27, 2014.

14. Attached hereto as Exhibit M is a true and correct copy of a transcript of a March 18, 2014 interview of Pablo Fajardo on Cable Noticias, and an English translation thereof.

15. Attached hereto as Exhibit N is a true and correct copy of an article titled "The RICO trial is an embarrassment not only for Judge Kaplan, but also for the United States," dated March 30, 2014, as it appeared on the website telegrafo.com.ec on March 31, 2014, and an English translation thereof.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 31, 2014 at Denver, Colorado.

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Jason Stavers 